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UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PREVIOUSLY-FILED DOCUMENTS
(DKT. 1670)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff's Administrative Motion to File Under Seal Previously-Filed Documents
6 (Dkt. 1670).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Revised version of Dkt. 1552-1	Blue-Highlighted Portions

9
10
11
12 3. The blue-highlighted portions of the revised version of Dkt. 1552-1 contain the
13 former email address of Anthony Levandowski, whose email account may become compromised
14 if disclosed to the public. Defendants seek to seal this information in order to protect the privacy
15 of Mr. Levandowski, as prominent individuals in this lawsuit are currently the subject of
16 extensive media coverage. Disclosure of this information could expose Mr. Levandowski to harm
17 or harassment.

18 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's filing
19 that merit sealing.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this
21 22nd day of September, 2017 in San Francisco, California.

22
23 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 22, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ